

Schedule (3)
Itemized List of Monetary Damages and Non-monetary Relief

A. Monetary Damages

1. Lost wages approximate \$82,161.27.
2. Lost railroad retirement benefits approximate \$50,510.71.
3. Lost interest approximates \$9,085.85.
4. Lost vacation time approximates \$1,440.74.
5. Incidental damages for expenses incurred in seeking alternative employment approximate \$225.12 (including 261 miles traveled at 36 cents per mile).
6. Statutory liquidated damages approximate \$143,063.69.
7. If Plaintiff obtains a favorable verdict, he will seek
 - a. Reasonable attorneys' fees¹
 - b. Litigation expenses,² and
 - c. Pre-judgment and post-judgment interest.

B. Non-Monetary Relief

1. Declaratory judgment declaring the actions of the defendant to be violations of federal and state law.
2. Prohibitory injunction restraining Defendant from engaging in the unlawful discriminatory practices charged in the Complaint and proved at trial.
3. Permanent injunction requiring Defendant to expunge Plaintiff's personnel files of any derogatory, false, or misleading information relating to this matter.

¹As of June 30, 2005, reasonable attorneys' fees approximate \$79,925.60.

²As of June 30, 2005, litigation expenses approximate \$7,435.73 (including 426 miles traveled at 36 cents per mile).